

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----X  
UNITED STATES OF AMERICA, :  
  
Plaintiff, : Criminal Action  
 : No. 19-10080-NMG  
v. :  
 : **ORAL ARGUMENT REQUESTED**  
AMY COBURN, *et al.*, :  
  
Defendants. :  
-----X

**DEFENDANTS’ MOTION IN *LIMINE* TO EXCLUDE  
EVIDENCE OF PRIVATE SCHOOL TUITION PAYMENTS**

Pursuant to Federal Rules of Evidence 401, 402, and 403, Defendants Gamal Abdelaziz [Def. No. 4], Elisabeth Kimmel [Def. No. 13], Marci Palatella [Def. No. 16], and John Wilson [Def. No. 17] (“Defendants”) respectfully move the Court for an order *in limine* excluding all evidence and argument concerning William “Rick” Singer’s unilateral decision to pay tuitions for the children of USC water polo coach Jovan Vavic.

The grounds for this Motion are set forth in the accompanying memorandum of law.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(D), Defendants respectfully request oral argument on this motion.

/s/ Michael Kendall

Michael Kendall

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

The undersigned counsel hereby certifies that counsel for Defendants has conferred with counsel for the government and attempted in good faith to resolve or narrow the issues raised by this motion, but could not obtain counsel's agreement to the relief sought by this motion.

/s/ Michael Kendall

Michael Kendall

Dated: July 30, 2021  
Boston, Massachusetts

Respectfully submitted,

/s/ Brian T. Kelly

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